

**SITE INSPECTION PRIORITIZATION REPORT  
AND PASCORE PACKAGE  
SOUTH HOUSTON DRUM  
PHASE I  
HOUSTON, HARRIS COUNTY, TEXAS  
EPA ID NO.: TXD981058951**

**Prepared for:**

**The United States Environmental Protection Agency  
Region VI  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733**

**Contract No.: 68-W9-0015  
Work Assignment: 27-6JZZ  
Document Control No.: 4603-27-0188**

**Submitted by:**

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**July 1994**

**9822659**



**Prepared by: Dennis Hayes, P.G./Robert Beck, P.E.**

## **INTRODUCTION**

Roy F. Weston, Inc. (WESTON®) is pleased to present this letter report, which summarizes the results of the file review and PAscore package completed for the South Houston Drum site (a.k.a. South Acres Drum), (TXD981058951) Houston, Texas. This effort is part of the Site Inspection Prioritization (SIP) Work Assignment for various sites in EPA Region VI and is solely based on file information provided by the EPA.

## **SITE BACKGROUND INFORMATION**

The South Houston Drum site, located at 6218 South Acres Drive (Attachment 1), accepted drummed hazardous waste from Haul-A-Drum, a drum recycling business, until 1981. According to a 1986 CERCLA Site Investigation/Removal Action Report, 421 drums were stored at the site in varying degrees of corrosion. As a result of the corrosion, several drums leaked hazardous materials onto the ground. In May 1986 EPA contractor, Riedel Environmental Services, Inc. began removal action with sampling of drums and contaminated soil. Analyses indicated that surface soil contamination extended to a depth of 18 inches. Based on analyses, drum contents were categorized into volatile organics, resins, oxidizers, acids, bases, chlorinated hydrocarbons, and non-manageable solids. By 1 July 1986, the 421 drums and 87 cubic yards of contaminated soil had been removed and transported to a RCRA disposal facility in Carlyss, Louisiana operated by Chemical Waste Management. The removal action was completed on 11 July 1986.

## **HRS SCORING**

Using the data provided by the EPA from CERCLA files, WESTON developed an HRS score for the site using PAscore (Version 2.0) (Attachment 2) as a screening tool, and the site received a score of zero. Pathway scoring factors are discussed in the following paragraphs.

## **WASTE SOURCE CHARACTERISTICS**

The 1986 CERCLA Site Investigation/Removal Action Report identified seven hazardous waste types in the drums stored on site and in the contaminated surface soil. Removal of 421 drums and 87 cubic yards of contaminated soil have reportedly mitigated the threat to public health and environment.

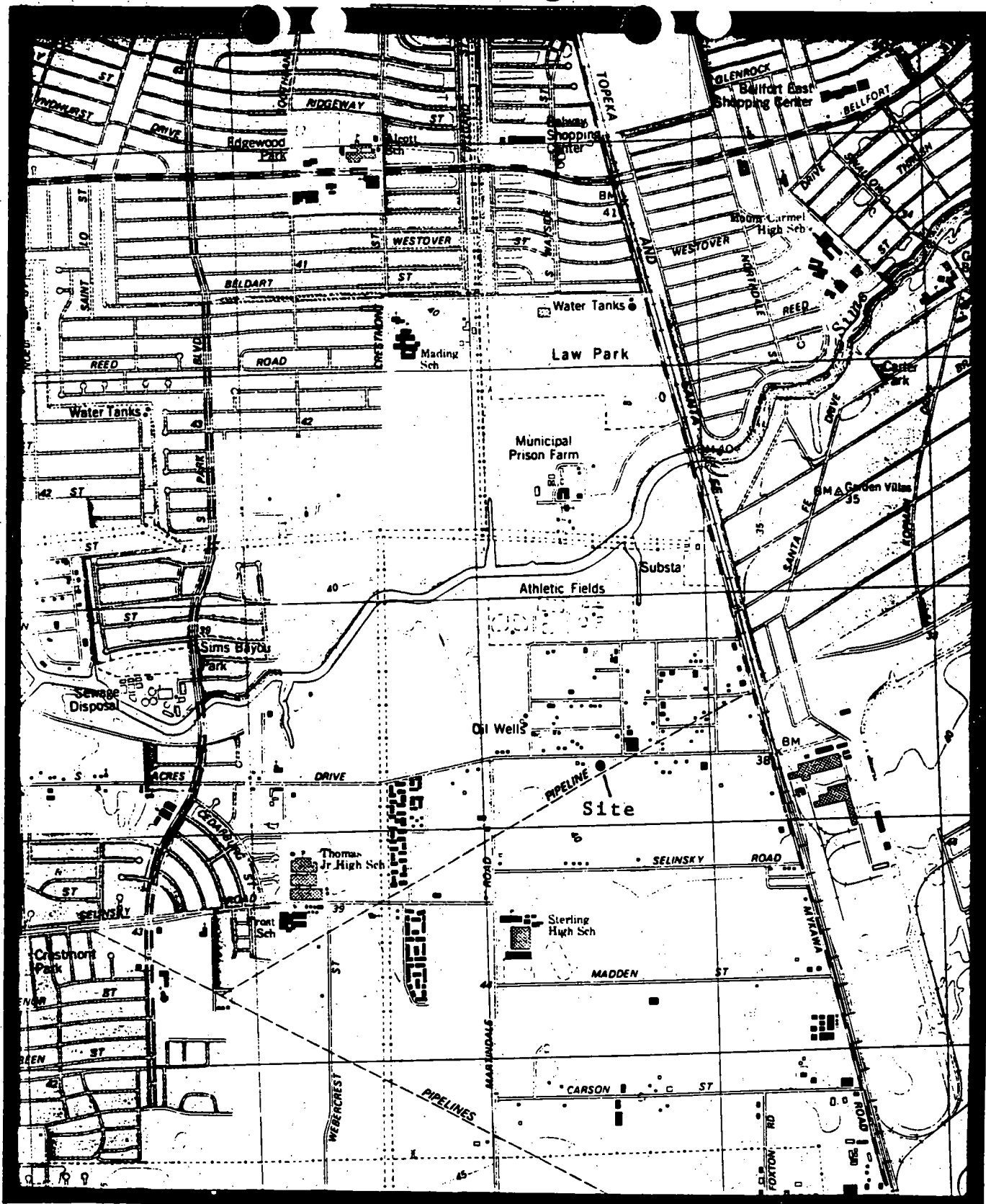
## **MIGRATION AND EXPOSURE PATHWAYS**

The soil exposure pathway scored a 1, primarily because a residence is located 150 feet from the site on the adjacent property. Remediation efforts included removing the contaminated soil from the site and trucking in clean soil to fill in the excavation. The air, surface water, and groundwater pathways scored zero since the waste source no longer exists.

## **CONCLUSIONS**

**The South Houston Drum site in Houston, Texas scored a PAscore of zero since the site was fully remediated by an EPA contractor, Riedel Environmental Services, Inc. in 1986.**

## **ATTACHMENT 1**



TITLE: Removal Action  
South Houston Drum Site

LOCATION: 6218 South Acres  
Houston, Harris Cty., Tx.

MAP: Park Place, Tx. U.S.G.S. 7.5 min. series

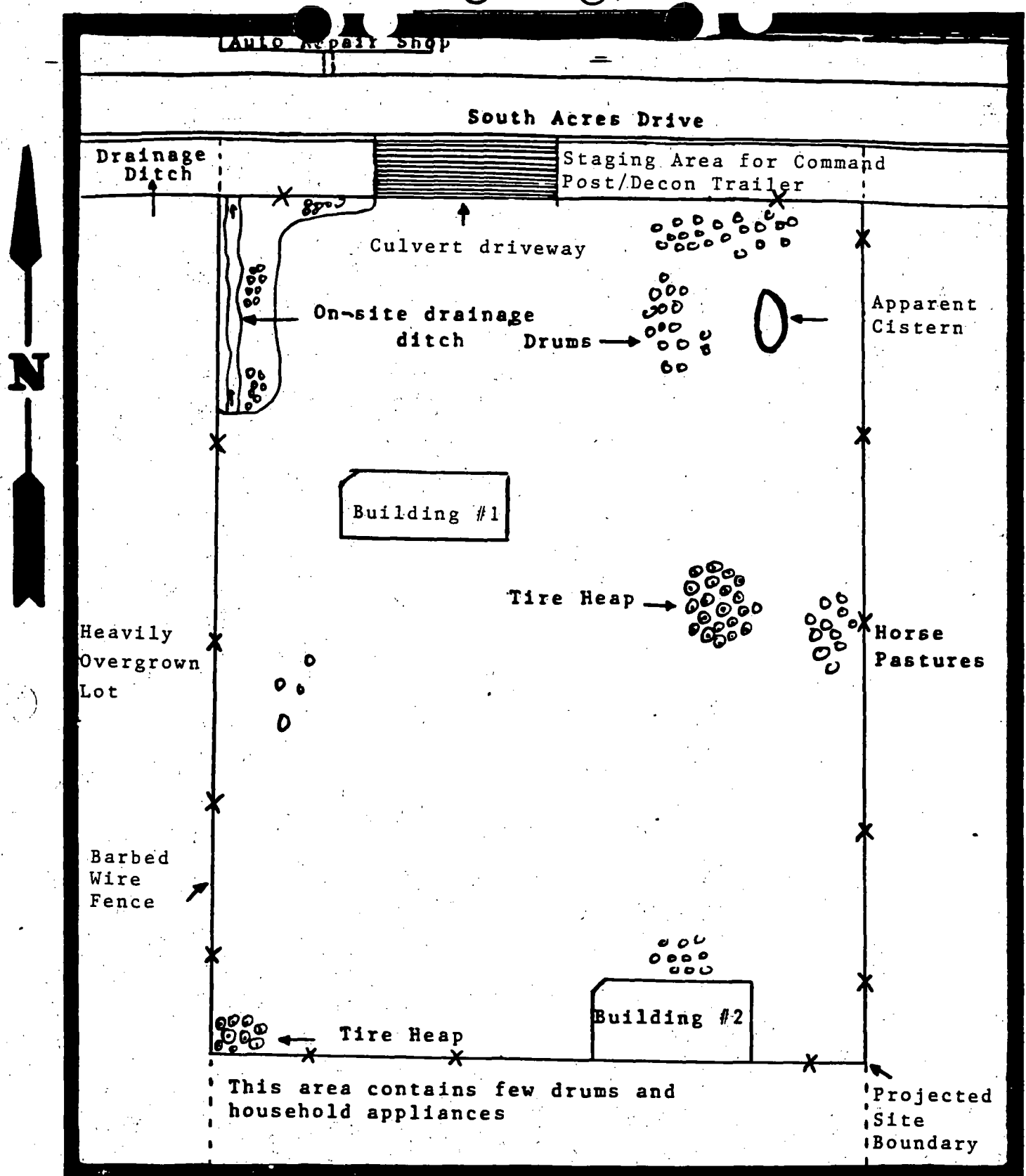
**SCALE:** 1:24,000

ORIGINATOR: Warren Zehner

DATE: 10/20/86 TDD: 06-8610-07

DCN. TAT-21-F-- 03603

WARREN ZEHNER



TITLE: Removal Action -

South Houston Drum Site

LOCATION: 6218 South Acres

Houston, Harris Cty., Tx.

MAP: Site Sketch

SCALE: None

ORIGINATOR: Warren Zehner

DATE: 10/20/86 TDD: 06-8610-07

DCN TAT-21-E-- 03604

## **ATTACHMENT 2**

**PA-SCORE**

**PA SCORESHEETS**

Site Name: South Houston Drums  
CERCLIS ID No.: TXD981058951  
Street Address: 6218 South Acres  
City/State/Zip: Houston, Tx

Investigator: Dennis Hayes  
Agency/Organization: Weston, Inc.  
Street Address: 5599 San Felipe Ste. 700  
City/State: Houston, Tx

Date: 7/28/1994



**PA-Score 2.0 Scoresheets**  
**South Houston Drums - 07/29/94**

**Page: 1**

OMB Approval Number: 2050-0095  
 Approved for Use Through: 4/95

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT FORM				IDENTIFICATION	
				State: Tx	CERCLIS Number: TXD981058951
				CERCLIS Discovery Date: UNKNOWN	
<b>1. General Site Information</b>					
Name: South Houston Drums			Street Address: 6218 South Acres		
City: Houston	State: Tx	Zip Code:	County: Harris	Co. Code:	Cong. Dist:
Latitude: 0° 0' 0.0"	Longitude: 0° 0' 0.0"	Approx. Area of Site: 18000 sq feet		Status of Site: Inactive	
<b>2. Owner/Operator Information</b>					
Owner: Betty King			Operator: Uncle of Betty King		
Street Address: 6218 South Acres			Street Address: N.A.		
City: Houston			City:		
State: Tx	Zip Code:	Telephone:	State:	Zip Code:	Telephone:
Type of Ownership: Private			How Initially Identified: Not Specified		

<b>POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT FORM</b>		<b>IDENTIFICATION</b>	
		State: Tx	CERCLIS Number: TXD981058951
		CERCLIS Discovery Date: UNKNOWN	
<b>3. Site Evaluator Information</b>			
Name of Evaluator: Dennis Hayes		Agency/Organization: Weston, Inc.	
		Date Prepared: 7/28/1994	
Street Address: 5599 San Felipe Ste. 700		City: Houston	State: Tx
Name of EPA or State Agency Contact: Stacey Bennett		Telephone: 214-655-8374	
Street Address: 1445 Ross Avenue Ste. 1200		City: Dallas	State: Tx
<b>4. Site Disposition (for EPA use only)</b>			
Emergency Response/Removal Assessment	CERCLIS Recommendation: J	Signature:	
Recommendation: No		Name:	
Date:	Date:	Position:	

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT FORM	IDENTIFICATION	
	State: Tx	CERCLIS Number: TXD981058951
	CERCLIS Discovery Date: UNKNOWN	

### 5. General Site Characteristics

Predominant Land Uses Within 1 Mile of Site: 0 1 Commercial Agricultural	Site Setting:  Rural	Years of Operation: Beginning Year: 0  Ending Year: 1981  X Unknown
Type of Site Operations: 0 1 Junk/Salvage Yard	Waste Generated: Onsite	
	Waste Deposition Authorized By: Former Owner	
	Waste Accessible to the Public No	
	Distance to Nearest Dwelling, School, or Workplace: 50 Feet	

### 6. Waste Characteristics Information

No Sources	General Types of Waste: Organics Inorganics Solvents Construction/Demolition Waste Acids/Bases
	Physical State of Waste as Deposited Liquid

<p>POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT FORM</p>		IDENTIFICATION	
		State: Tx	CERCLIS Number: TXD981058951
		CERCLIS Discovery Date: UNKNOWN	
7. Ground Water Pathway			
<p>Is Ground Water Used for Drinking Water Within 4 Miles: <del>Yes</del> <b>yes</b> <i>ff 8/10/94</i></p> <p>Type of Ground Water Wells Within 4 Miles: Private</p>	<p>Is There a Suspected Release to Ground Water: No</p>	<p>List Secondary Target Population Served by Ground Water Withdrawn From:</p>	
<p>Depth to Shallowest Aquifer: 100 Feet</p> <p>Karst Terrain/Aquifer Present: No</p>	<p>Have Primary Target Drinking Water Wells Been Identified: No</p> <p>Nearest Designated Wellhead Protection Area: None within 4 Miles</p>	<p>0 - 1/4 Mile 3</p> <p>&gt;1/4 - 1/2 Mile 0</p> <p>&gt;1/2 - 1 Mile 0</p> <p>&gt;1 - 2 Miles 0</p> <p>&gt;2 - 3 Miles 0</p> <p>&gt;3 - 4 Miles 0</p> <p>Total 3</p>	

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT FORM	IDENTIFICATION	
	State: Tx	CERCLIS Number: TXD981058951
	CERCLIS Discovery Date: UNKNOWN	

8. Surface Water Pathway

Part 1 of 4

Type of Surface Water Draining Site and 15 Miles Downstream: River	Shortest Overland Distance From Any Source to Surface Water:  3000 Feet 0.6 Miles
Is there a Suspected Release to Surface Water: No	Site is Located in: Annual - 10 yr floodplain

8. Surface Water Pathway

Part 2 of 4

Drinking Water Intakes Along the Surface Water Migration Path: No
Have Primary Target Drinking Water Intakes Been Identified: No
Secondary Target Drinking Water Intakes: None

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT FORM	IDENTIFICATION	
	State: Tx	CERCLIS Number: TXD981058951
	CERCLIS Discovery Date: UNKNOWN	

8. Surface Water Pathway	Part 3 of 4
Fisheries Located Along the Surface Water Migration Path: No Have Primary Target Fisheries Been Identified: No Secondary Target Fisheries: None	

8. Surface Water Pathway	Part 4 of 4
Wetlands Located Along the Surface Water Migration Path? (y/n) No Have Primary Target Wetlands Been Identified? (y/n) No Secondary Target Wetlands: None	

Other Sensitive Environments Along the Surface Water Migration Path: No Have Primary Target Sensitive Environments Been Identified: No Secondary Target Sensitive Environments: None	
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<p>POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT FORM</p>	IDENTIFICATION	
	State: Tx	CERCLIS Number: TXD981058951
	CERCLIS Discovery Date: UNKNOWN	

9. Soil Exposure Pathway

<p>Are People Occupying Residences or Attending School or Daycare on or Within 200 Feet of Areas of Known or Suspected Contamination: No</p>	<p>Number of Workers Onsite: None</p>
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Have Terrestrial Sensitive Environments Been Identified on or Within 200 Feet of Areas of Known or Suspected Contamination: No

10. Air Pathway

<p>Total Population on or Within:</p> <table> <tr> <td>Onsite</td> <td>0</td> </tr> <tr> <td>0 - 1/4 Mile</td> <td>3</td> </tr> <tr> <td>&gt;1/4 - 1/2 Mile</td> <td>0</td> </tr> <tr> <td>&gt;1/2 - 1 Mile</td> <td>2000</td> </tr> <tr> <td>&gt;1 - 2 Miles</td> <td>0</td> </tr> <tr> <td>&gt;2 - 3 Miles</td> <td>0</td> </tr> <tr> <td>&gt;3 - 4 Miles</td> <td>0</td> </tr> <tr> <td>Total</td> <td>2003</td> </tr> </table>	Onsite	0	0 - 1/4 Mile	3	>1/4 - 1/2 Mile	0	>1/2 - 1 Mile	2000	>1 - 2 Miles	0	>2 - 3 Miles	0	>3 - 4 Miles	0	Total	2003	<p>Is There a Suspected Release to Air: No</p> <p>Wetlands Located Within 4 Miles of the Site: No</p> <p>Other Sensitive Environments Located Within 4 Miles of the Site: No</p>
Onsite	0																
0 - 1/4 Mile	3																
>1/4 - 1/2 Mile	0																
>1/2 - 1 Mile	2000																
>1 - 2 Miles	0																
>2 - 3 Miles	0																
>3 - 4 Miles	0																
Total	2003																

Sensitive Environments Within 1/2 Mile of the Site:  
None

WASTE CHARACTERISTICS

Waste Characteristics (WC) Calculations:

\*\* Only First WC Page Is Printed \*\*

Waste Characteristics Score: WC = 0



Ground Water Pathway Criteria List  
Suspected Release

Are sources poorly contained? (y/n/u)	N
Is the source a type likely to contribute to ground water contamination (e.g., wet lagoon)? (y/n/u)	N
Is waste quantity particularly large? (y/n/u)	N
Is precipitation heavy? (y/n/u)	Y
Is the infiltration rate high? (y/n/u)	N
Is the site located in an area of karst terrain? (y/n)	N
Is the subsurface highly permeable or conductive? (y/n/u)	N
Is drinking water drawn from a shallow aquifer? (y/n/u)	U
Are suspected contaminants highly mobile in ground water? (y/n/u)	N
Does analytical or circumstantial evidence suggest ground water contamination? (y/n/u)	N

Other criteria? (y/n) N

SUSPECTED RELEASE? (y/n) N

Summarize the rationale for Suspected Release:

SAMPLING EFFORTS DETERMINED CONTAMINATION PENETRATED 18 INCHES INTO THE SOIL. THE 1986 REMOVAL ACTION REMOVED CONTAMINATED SOIL ALONG WITH THE DRUMS. AS A RESULT NO RELEASE TO GROUNDWATER IS SUSPECTED.

Ref: 1

Ground Water Pathway Criteria List  
Primary Targets

Is any drinking water well nearby? (y/n/u)

Has any nearby drinking water well been closed? (y/n/u)

Has any nearby drinking water well user reported  
foul-testing or foul-smelling water? (y/n/u)

Does any nearby well have a large drawdown/high production rate? (y/n/u)

Is any drinking water well located between the site and other wells  
that are suspected to be exposed to a hazardous substance? (y/n/u)

Does analytical or circumstantial evidence suggest contamination  
at a drinking water well? (y/n/u)

Does any drinking water well warrant sampling? (y/n/u)

Other criteria? (y/n)

PRIMARY TARGET(S) IDENTIFIED? (y/n)

Summarize the rationale for Primary Targets:

GROUND WATER PATHWAY SCORESHEETS

Pathway Characteristics

			Ref.
Do you suspect a release? (y/n)	No		
Is the site located in karst terrain? (y/n)	No		
Depth to aquifer (feet):	100		
Distance to the nearest drinking water well (feet):	50	1	

LIKELIHOOD OF RELEASE	Suspected Release	No Suspected Release	References
1. SUSPECTED RELEASE	0		
2. NO SUSPECTED RELEASE		340	
LR =	0	340	

Targets

TARGETS	Suspected Release	No Suspected Release	References
3. PRIMARY TARGET POPULATION 0 person(s)	0		
4. SECONDARY TARGET POPULATION Are any wells part of a blended system? (y/n) N	0	1	
5. NEAREST WELL	0	20	
6. WELLHEAD PROTECTION AREA None within 4 Miles	0	0	
7. RESOURCES	0	5	
T =	0	26	

WASTE CHARACTERISTICS

WC =		
	0	0

GROUND WATER PATHWAY SCORE:

0
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**PA-Score 2.0 Scoresheets**  
**South Houston Drums - 07/29/94**

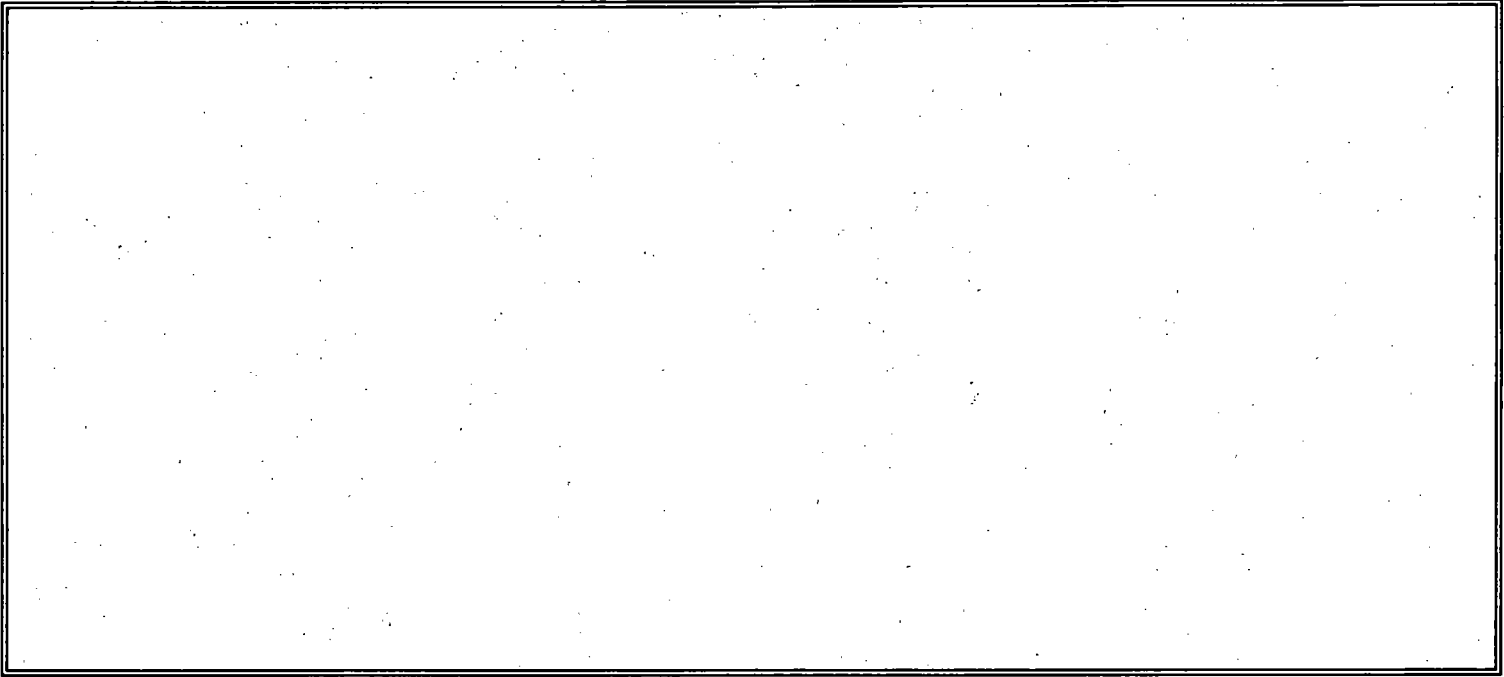
**Page: 5**

**Ground Water Target Populations**

Primary Target Population Drinking Water Well ID	Dist. (miles)	Population Served	Reference	Value
None				
*** Note : Maximum of 5 Wells Are Printed ***			Total	

Secondary Target Population Distance Categories	Population Served	Reference	Value
0 to 1/4 mile	3	2	1
Greater than 1/4 to 1/2 mile	0		0
Greater than 1/2 to 1 mile	0		0
Greater than 1 to 2 miles	0		0
Greater than 2 to 3 miles	0		0
Greater than 3 to 4 miles	0		0
Total			1

Apportionment Documentation for a Blended System



Surface Water Pathway Criteria List  
Suspected Release

Is surface water nearby? (y/n/u)	N
Is waste quantity particularly large? (y/n/u)	N
Is the drainage area large? (y/n/u)	N
Is rainfall heavy? (y/n/u)	Y
Is the infiltration rate low? (y/n/u)	Y
Are sources poorly contained or prone to runoff or flooding? (y/n/u)	Y
Is a runoff route well defined(e.g.ditch/channel to surf.water)? (y/n/u)	Y
Is vegetation stressed along the probable runoff path? (y/n/u)	U
Are sediments or water unnaturally discolored? (y/n/u)	U
Is wildlife unnaturally absent? (y/n/u)	U
Has deposition of waste into surface water been observed? (y/n/u)	Y
Is ground water discharge to surface water likely? (y/n/u)	N
Does analytical/circumstantial evidence suggest S.W. contam? (y/n/u)	N

Other criteria? (y/n) N

SUSPECTED RELEASE? (y/n) N

Summarize the rationale for Suspected Release:

Contaminated soil and drums have been removed from the site in 1986.

Ref: 1

Surface Water Pathway Criteria List  
Primary Targets

Is any target nearby? (y/n/u)	If yes:	N
U Drinking water intake		
U Fishery		
U Sensitive environment		
Has any intake, fishery, or recreational area been closed? (y/n/u)		N
Does analytical or circumstantial evidence suggest surface water contamination at or downstream of a target? (y/n/u)		N
Does any target warrant sampling? (y/n/u)	If yes:	N
U Drinking water intake		
U Fishery		
N Sensitive environment		

Other criteria? (y/n) N

PRIMARY INTAKE(S) IDENTIFIED? (y/n) N

Summarize the rationale for Primary Intakes:

Site has been cleaned up with contaminated soil removed.

Ref: 1  
continued -----

continued -----

Other criteria? (y/n) N

PRIMARY FISHERY(IES) IDENTIFIED? (y/n) N

Summarize the rationale for Primary Fisheries:

Contaminated soil and drums were removed from site in 1986

Ref: 1

Other criteria? (y/n) N

PRIMARY SENSITIVE ENVIRONMENT(S) IDENTIFIED? (y/n) N

Summarize the rationale for Primary Sensitive Environments:

No sensitive environments were identified in files reviewed.

Ref:



SURFACE WATER PATHWAY SCORESHEETS

Pathway Characteristics

		Ref.
Do you suspect a release? (y/n)	No	
Distance to surface water (feet):	3000	
Flood frequency (years):	1-10	
What is the downstream distance (miles) to:		
a. the nearest drinking water intake?	0.0	
b. the nearest fishery?	0.0	
c. the nearest sensitive environment?	0.0	

LIKELIHOOD OF RELEASE	Suspected Release	No Suspected Release	References
1. SUSPECTED RELEASE	0		
2. NO SUSPECTED RELEASE		500	
LR =	0	500	

Drinking Water Threat Targets

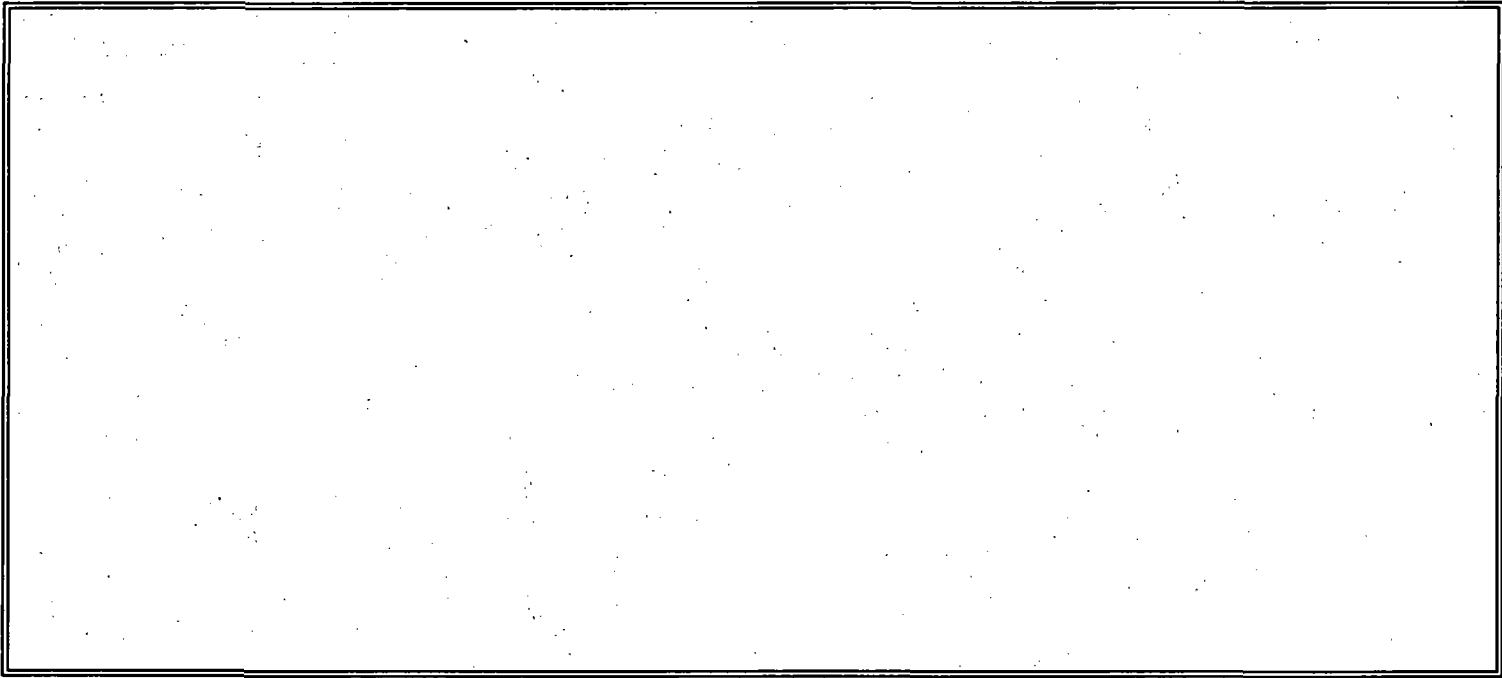
TARGETS	Suspected Release	No Suspected Release	References
3. Determine the water body type, flow (if applicable), and number of people served by each drinking water intake.			
4. PRIMARY TARGET POPULATION 0 person(s)	0		
5. SECONDARY TARGET POPULATION Are any intakes part of a blended system? (y/n): N	0	0	
6. NEAREST INTAKE	0	0	
7. RESOURCES	0	5	
T =	0	5	

Drinking Water Threat Target Populations

Intake Name	Primary (y/n)	Water Body Type/Flow	Population Served	Ref.	Value
None					
Total Primary Target Population Value					0
Total Secondary Target Population Value					0

\*\*\* Note : Maximum of 6 Intakes Are Printed \*\*\*

**Apportionment Documentation for a Blended System**



Human Food Chain Threat Targets

TARGETS	Suspected Release	No Suspected Release	References
8. Determine the water body type and flow for each fishery within the target limit.			
9. PRIMARY FISHERIES	0		
10. SECONDARY FISHERIES	0	0	
T =	0	0	

Human Food Chain Threat Targets

Fishery Name	Primary (y/n)	Water Body Type/Flow	Ref.	Value
None				
Total Primary Fisheries Value				0
Total Secondary Fisheries Value				0

\*\*\* Note : Maximum of 6 Fisheries Are Printed \*\*\*

Environmental Threat Targets

TARGETS	Suspected Release	No Suspected Release	References
11. Determine the water body type and flow (if applicable) for each sensitive environment.			
12. PRIMARY SENSITIVE ENVIRONMENTS	0		
13. SECONDARY SENSITIVE ENVIRONS.	0	0	
T =	0	0	

Environmental Threat Targets

Sensitive Environment Name	Primary (y/n)	Water Body Type/Flow	Ref.	Value
None				
Total Primary Sensitive Environments Value				0
Total Secondary Sensitive Environments Value				0

\*\*\* Note: Maximum of 6 Sensitive Environments Are Printed \*\*\*

Surface Water Pathway Threat Scores

Threat	Likelihood of Release(LR) Score	Targets(T) Score	Pathway Waste Characteristics (WC) Score	Threat Score LR x T x WC / 82,500
Drinking Water	500	5	0	0
Human Food Chain	500	0	0	0
Environmental	500	0	0	0

SURFACE WATER PATHWAY SCORE:

0

Soil Exposure Pathway Criteria List  
Resident Population

Is any residence, school, or daycare facility on or within 200 feet of an area of suspected contamination? (y/n/u)	N
Is any residence, school, or daycare facility located on adjacent land previously owned or leased by the site owner/operator? (y/n/u)	N
Is there a migration route that might spread hazardous substances near residences, schools, or daycare facilities? (y/n/u)	N
Have onsite or adjacent residents or students reported adverse health effects, exclusive of apparent drinking water or air contamination problems? (y/n/u)	U
Does any neighboring property warrant sampling? (y/n/u)	N
Other criteria? (y/n)	N

RESIDENT POPULATION IDENTIFIED? (y/n) N

Summarize the rationale for Resident Population:

A residence is located 50 feet from the site; however, since the site has been remediated by EPA suspected contaminated areas no longer exist.

Ref: 1, 2

SOIL EXPOSURE PATHWAY SCORESHEETS

Pathway Characteristics

		Ref.
Do any people live on or within 200 ft of areas of suspected contamination? (y/n)	No	2
Do any people attend school or daycare on or within 200 ft of areas of suspected contamination? (y/n)	No	1
Is the facility active? (y/n):	No	

LIKELIHOOD OF EXPOSURE	Suspected Contamination	References
1. SUSPECTED CONTAMINATION LE =	550	

Targets

2. RESIDENT POPULATION 0 resident(s) 0 school/daycare student(s)	0	
3. RESIDENT INDIVIDUAL	0	
4. WORKERS None	0	
5. TERRES. SENSITIVE ENVIRONMENTS	0	
6. RESOURCES	5	
T =	5	

WASTE CHARACTERISTICS

WC =

0

RESIDENT POPULATION THREAT SCORE:

0

NEARBY POPULATION THREAT SCORE:

1

Population Within 1 Mile: 1 - 10,000

SOIL EXPOSURE PATHWAY SCORE:

1



Soil Exposure Pathway Terrestrial Sensitive Environments

Terrestrial Sensitive Environment Name	Reference	Value
None		
Total Terrestrial Sensitive Environments Value		

\*\*\* Note : Maximum of 7 Sensitive Environments Are Printed \*\*\*

Air Pathway Criteria List  
Suspected Release

Are odors currently reported? (y/n/u) N

Has release of a hazardous substance to the air  
been directly observed? (y/n/u) N

Are there reports of adverse health effects (e.g., headaches,  
nausea, dizziness) potentially resulting from migration  
of hazardous substances through the air? (y/n/u) N

Does analytical/circumstantial evidence suggest release to air? (y/n/u) U

Other criteria? (y/n) N

SUSPECTED RELEASE? (y/n) N

Summarize the rationale for Suspected Release:

Soil and drums have been removed from the site.

Ref: 1

AIR PATHWAY SCORESHEETS

Pathway Characteristics

Do you suspect a release? (y/n)			No	Ref.
Distance to the nearest individual (feet):			0	
LIKELIHOOD OF RELEASE	Suspected Release	No Suspected Release	References	
1. SUSPECTED RELEASE	0			
2. NO SUSPECTED RELEASE		500		
LR =		0		

Targets

TARGETS	Suspected Release	No Suspected Release	References
3. PRIMARY TARGET POPULATION 0 person(s)	0		
4. SECONDARY TARGET POPULATION	0	4	
5. NEAREST INDIVIDUAL	0	20	
6. PRIMARY SENSITIVE ENVIRONS.	0		
7. SECONDARY SENSITIVE ENVIRONS.	0	0	
8. RESOURCES	0	5	
T =		0	29

WASTE CHARACTERISTICS

WC =

0	0
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AIR PATHWAY SCORE:

0
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Air Pathway Secondary Target Populations

Distance Categories	Population	References	Value
Onsite	0		0
Greater than 0 to 1/4 mile	3		1
Greater than 1/4 to 1/2 mile	0		0
Greater than 1/2 to 1 mile	2000		3
Greater than 1 to 2 miles	0		0
Greater than 2 to 3 miles	0		0
Greater than 3 to 4 miles	0		0
Total Secondary Population Value			4

Air Pathway Primary Sensitive Environments

Sensitive Environment Name	Reference	Value
None		
Total Primary Sensitive Environments Value		

\*\*\* Note : Maximum of 7 Sensitive Environments Are Printed\*\*\*

Air Pathway Secondary Sensitive Environments

Sensitive Environment Name	Distance	Reference	Value
None			
Total Secondary Sensitive Environments Value			

**PA-Score 2.0 Scoresheets**  
**South Houston Drums - 07/29/94**

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SITE SCORE CALCULATION	SCORE
GROUND WATER PATHWAY SCORE:	0
SURFACE WATER PATHWAY SCORE:	0
SOIL EXPOSURE PATHWAY SCORE:	1
AIR PATHWAY SCORE:	0
SITE SCORE:	0

SUMMARY

1. Is there a high possibility of a threat to any nearby drinking water well(s) by migration of a hazardous substance in ground water? No

If yes, identify the well(s).

If yes, how many people are served by the threatened well(s)? 0

2. Is there a high possibility of a threat to any of the following by hazardous substance migration in surface water?

A. Drinking water intake

Yes

B. Fishery

Yes

C. Sensitive environment (wetland, critical habitat, others)

Yes

If yes, identity the target(s).

3. Is there a high possibility of an area of surficial contamination within 200 feet of any residence, school, or daycare facility? Yes

If yes, identify the properties and estimate the associated population(s)

4. Are there public health concerns at this site that are not addressed by PA scoring considerations? Yes

If yes, explain:

REFERENCE LIST

1. WESTON, TAT. 1986. CERCLA SITE INVESTIGATION/REMOVAL ACTION REPORT FOR 6218 SOUTH ACRES SITE HOUSTON, TEXAS. PREPARED FOR EPA - REGION VI EMERGENCY RESPONSE BRANCH. 21 OCTOBER 1986.
2. LOPEZ, D. EPA ON-SCENE COORDINATOR. 1985. MEMORANDUM TO DICK WHITTINGTON, EPA REGIONAL ADMINISTER REGARDING IMMEDIATE REMOVAL RECOMMENDATION FOR SOUTH ACRES SITE. 9 OCTOBER 1985.



## **REFERENCE 1**

**WESTON • SPER**

DOCUMENT CONTROL #TAT-21-F-03602

**CERCLA SITE INVESTIGATION/REMOVAL ACTION REPORT  
FOR**

**6218 ~~SOUTH ACRES SITE~~**

**~~HOUSTON,~~ HARRIS COUNTY, TEXAS**

**TXD981058951**

**Prepared for**

**EPA - REGION VI  
EMERGENCY RESPONSE BRANCH**

**Gerald Fontenot  
Deputy Project Officer**

**BY**

**Roy F. Weston, Inc.  
Technical Assistance Team  
Houston, Texas**

**DATE**

**10/21/86**

~~SOUTH HOUSTON DRUM SITES~~

6218 ~~SOUTH ACRES~~ REMOVAL

HOUSTON, HARRIS COUNTY, TEXAS

TXD 981058951

ON-SCENE COORDINATOR'S AFTER-ACTION  
REPORT FOR THE IMMEDIATE REMOVAL ACTION

DONNA METCALF

ON-SCENE COORDINATOR

ENVIRONMENTAL PROTECTION AGENCY

REGION VI, DALLAS, TEXAS

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### **Attachments**

- 1. Copy of Action Memo and Requests for Ceiling Increase
- 2. Copy of Administrative Order
- 3. Significant Analytical Data
- 4. Photographs
- 5.\* CDC Data Assessments
- 6. POLREPs/Site Log
- 7. Delivery Order
- 8. Cost Information
  - a. Certified Invoices
  - b. 1900-55 Contractor Cost Reports
  - c. Daily Cost Summaries
- 9. Shipping Manifest Copies
- 10. Site Sketch, Maps

\* Not included in report, will be furnished by OSC

## **I. Summary of Events**

### **A. Location and Physical Description**

The 6218 South Acres site is located within the city limits of Houston, Harris County, Texas. A U.S.G.S. 7.5 minute series quadrangle map of the site location is included in this report. The site dimensions are 90 ft x 210 ft. The perimeter measurement is 600 ft.

The site consists of two dilapidated buildings, 421 drums, both full and empty, of various chemical products, and several hundred yards of household junk; eg. washing machine, sofa, television. The immediate area around the site is somewhat rural. The site is bounded on the south and east by open lots used for domestic animal pasture and crude oil production. Across South Acres to the north of the site is a small operating Toyota repair facility. On the west side of the site is a residence that was in the process of being remodeled by an evangelistic church group for the purpose of conducting religious services. Several large residential and commercial areas are also located within a two mile radius of the site.

The site is located within the Gulf Coast Plain and the topography is, in general, flat. Runoff from the site enters into an unlined bar ditch running parallel to South Acres and eventually enters Sims Bayou. However, due to the large amount of naturally occurring organic debris restricting flow in the ditch, it appears unlikely that any runoff from the site would attain the Sims Bayou system.

### **B. Initial Situation**

The site was reportedly owned and operated by the uncle of the the current landowner, Mrs. Betty King. Reportedly the facility was originally operated as a used merchandise dealership. For some unreported reason the facility progressed from a used merchandise facility to a scrap metal/drum sales or storage business. The uncle was known to have been an acquaintance of Mr. Leshner, owner of Haul-A-Drum, and had done business with Mr. Leshner on several occasions, either buying or storing drums from Mr. Leshner's facilities in the South Houston area. These facilities operated by Mr. Leshner have been addressed in prior removal actions.

The site was closed/abandoned in 1980-81, reportedly as the result of the uncle's failing health. The drums left on-site were exposed to the elements and began to corrode. As a result of corrosion several of the drums on-site began leaking and discharging hazardous materials onto the ground and into the bar ditch paralleling South Acres. This site along with the facilities operated by Mr. Leshner was brought to the attention of EPA in March, 1985 by Mr. John Booher, City of South Houston Solid Waste/Hazardous Materials Unit Superintendent.

**C. Efforts to Obtain Response by Responsible Parties**

The property owner of this facility was listed as the potentially responsible party (PRP) in the Administrative Order dictating cleanup of the site on October 21, 1985. The PRP elected not to respond to the Order, ergo EPA assumed responsibility for the cleanup action on the site under CERCLA legislated authority.

**D. Cause of the Incident**

Drums containing a variety of hazardous materials from several local industries were brought to and stored on the site. the purpose of the storage and the potential utilization of the drums is unknown. There is no evidence on-site that would indicate that the drums were on the site for any purpose other than storage. When the facility was closed/abandoned the drums began to corrode discharging the contents into the environment.

**E. Organization of the Response**

The Action Memorandum for this site was signed on October 9, 1986. When the PRP failed to comply with the Administrative Order, EPA initiated the Immediate Removal Action. Delivery Order No.6-8606-028 was issued on May 9, 1986 to the Zone IV ERCS Contractor, Riedel Environmental Services, Inc. The removal action began on May 12th with consolidation of clean/dirty surface debris and the crushing of the empty drums on-site. This operation was completed on May 14th.

After the crushing/consolidation operation was completed the remaining drums containing liquids/sludges were overpacked and restaged for sampling. During the staging operation a soil sampling quadrant system was established. Four 40 feet x 100 feet quadrants were utilized in the sampling plan. Based on gas chromatographic interpretations of site assessment samples sent to the Houston EPA Lab, the presence of 2,3,7,8 TCDD was suspected on-site. The quadrant system utilized is adapted from the 2,3,7,8 TCDD sample methods utilized in Region VII. Each quadrant was divided into 10 foot square grids and a plug sample was scheduled to be taken from each grid intersect point in the northeast (#1) and the northwest (#2) quadrant. It appeared that the potential TCDD contamination was limited to quadrants #1 and #2, quadrants #3 and #4 had few drums and no visible chemical related surface contamination. Further dioxin sampling depended upon the results from quadrants #1 and #2.

Immediately after the completion of the restaging operation, May 15th, the sampling of the 121 overpacked drums began. All sampling, drum and soil, was completed on May 17th. A total of 6 surface composite samples of soil, 12 subsurface composites, 6", 12", 18", were taken from the four quadrants on-site. The surface composites from quadrants #1 and #2 were analyzed for 2,3,7,8 TCDD, all others were analyzed for priority pollutants/metals to establish the extent of soil contamination. An ERCS chemist conducted field compatibility or HAZCAT testing on the 121 samples obtained from the overpacked drums. Based on these results the samples were composited into 7 general chemical compatibility groups. All samples, 18 soil, 1 debris, 7 drums, were shipped for laboratory analysis on May 20th.

A security fence was erected around quadrants #1 and #2 on May 21st. This action was taken as an interim measure during the temporary demobilization, pending receipt of the sample results, to prevent potential human exposure from the site. Projected time frame of the temporary demobilization was 14-21 days.

The ERCS Contractor was remobilized on June 26th. Crew and decontamination trailer arrived on-site June 27th. Soil sample results indicated that 2,3,7,8 TCDD was not detected at the 0.6 ppb laboratory detection limit. However, other soil contaminant level in the drainage ditch paralleling South Acres and in quadrants #1 and #2 exceeded the action limits. Quadrants #3 and #4 sample results indicated no contamination above the action limit. No further action was planned in these areas. Excavation of the ditch area began on June 27th.

Due to an unforeseeable shortage in enclosed transport trailers, the shipment of the 121 overpacked drums on-site was delayed until June 30th. These drums were sent to the RCRA approved disposal facility operated by Chem Waste Management in Carlyss, Louisiana. After removal of the overpacked drums soil excavation in quadrants #1 and #2 began. A total of 87 cubic yards of contaminated soil/debris was removed from the drainage ditch and quadrants #1 and #2. This material was also transported to the Carlyss, Louisiana facility for disposal on July.

Approximately 80 cubic yards of clean fill material was delivered and spread into the excavated areas in quadrants 1 and 2 on July 2nd. The security fence was dismantled and final site demobilization also occurred on this date.

## **II. Effectiveness of the Removal Action**

All the drums of hazardous materials and contaminated surface debris have been removed. Several yards of contaminated soil from the site and the drainage ditch paralleling South Acres were also removed. These actions taken under CERCLA legislated authority, eliminated the immediate threat to the public health and environment that existed on-site.

## **III. Problems Encountered**

The major problem that arose on-site was a severe lack of cooperation by the local utility services. The most serious of these problems occurred with the water utility. The South Acres site did not have a water source on it, ergo water had to be piped in from a water utility source remote to the site. The closest source was a fire hydrant northeast of the site, situated on the north side of South Acres. This source could not be utilized due to City Ordinances against running a water line across the surface of the street. The next available source was from a private well on the property immediately west of the site. The utilization of this source was originally denied due to City Health Ordinances against industrial utilization of a private residential well. This ordinance was later waived after several days of negotiation with the local water utility. Site activities were severely hampered by the lack of water on-site. Due to health and safety considerations/liabilities all operations that involved the chance of a chemical splash were suspended.

Traffic on South Acres proved to be another major problem. South Acres, in the site area, is only a two lane road, but serves as a major east-west traffic artery. The road also has very narrow shoulders which made the maneuvering of trucks and equipment onto the site a long and arduous task. On several occasions frustrated drivers came close to striking site workers as they were directing traffic.

## **IV. Conclusions**

The action was effective in mitigating the immediate threat to the public health and environment posed by the chemical substances on-site. As a result the removal is considered to be successful.



**V. Recommendations**

Based on problems encountered on this site, it is recommended that the availability of local utility access to site should be identified before trying to start site work. If the potential access problems encountered on this site with the utilities had been identified before the site mobilization occurred, these problems could have been resolved before the mobilization. This action would have saved 3-4 working days.

**VI. Chronology of Major Events**

Delivery Order issued to ERCS Zone 4 Contractor.

May 12, 1986 - Work began on-site with crushing empty drums and consolidating clean/dirty debris.

May 14, 1986 - Began overpacking remaining drums containing liquids/sludges for restaging.

May 15, 1986 - Completed restaging operation. Sampling of 121 overpacks for HAZCAT analysis began.

May 17, 1986 - Completed all sampling operations, soil and overpacks, on-site.

May 20, 1986 - Completed HAZCAT analysis. Shipped all soil and overpack composites for laboratory analysis.

May 21, 1986 - Erected security fence around quadrants 1 and 2. Temporarily demobilized site.

June 26, 1986 - Remobilized site after receipt of sample results. Work began on May 27th.

June 30, 1986 - Overpacks transported to Chem Waste facility in Carlyss, LA. for disposal.

July 1, 1986 - Contaminated soil/debris (87 cubic yards) excavated from site and transported to Carlyss, LA. for disposal.

July 2, 1986 - Excavated area backfilled with clean fill. Security fence was dismantled. Site demobilized and ERCS crew released.

July 11, 1986 - Temporarily reactivated site to obtain additional backfill for site, excavated and dressed sides of drainage ditch for proper drainage, and removed all debris that EPA had brought onto the site as a result of the removal action (fence material, support timbers, etc.) These activities were completed and site was deactivated on this date.

VII. Significant Items

The removal action was initiated on May 12, 1986 and completed on July 11, 1986. Funding for this action was derived from the stopgap measure approved by the President, while Congress debates the reauthorization of CERCLA legislation. The total amount of contaminated materials transported from the site for disposal is as follows:

Drums

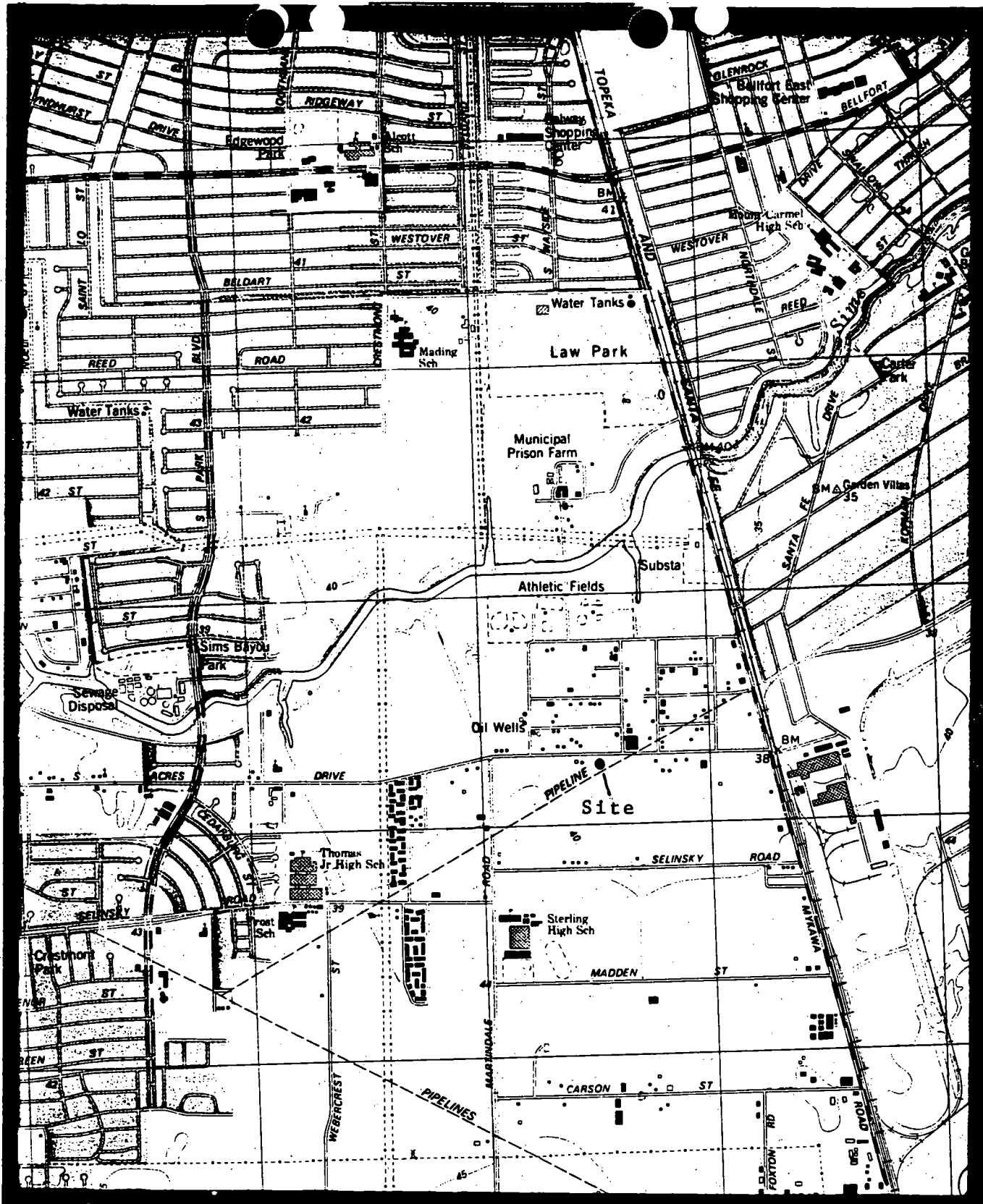
Crushed	-	300
Volatile	-	17
Resins/Negative		
HAZCAT results	-	90
Oxidizer	-	1
Acid	-	1
Base	-	6
Chlorinated Hydrocarbon	-	1
Non-Manageable Solids	-	5

421

Soil/Debris

87 Cubic yards

Total ERCS cost for removal action \_\_\_\_\_



TITLE: Removal Action

South Houston Drum Site

LOCATION: 6218 South Acres

Houston, Harris Cty., Tx.

Park Place, Tx.

MAP: U.S.G.S. 7.5 min. series

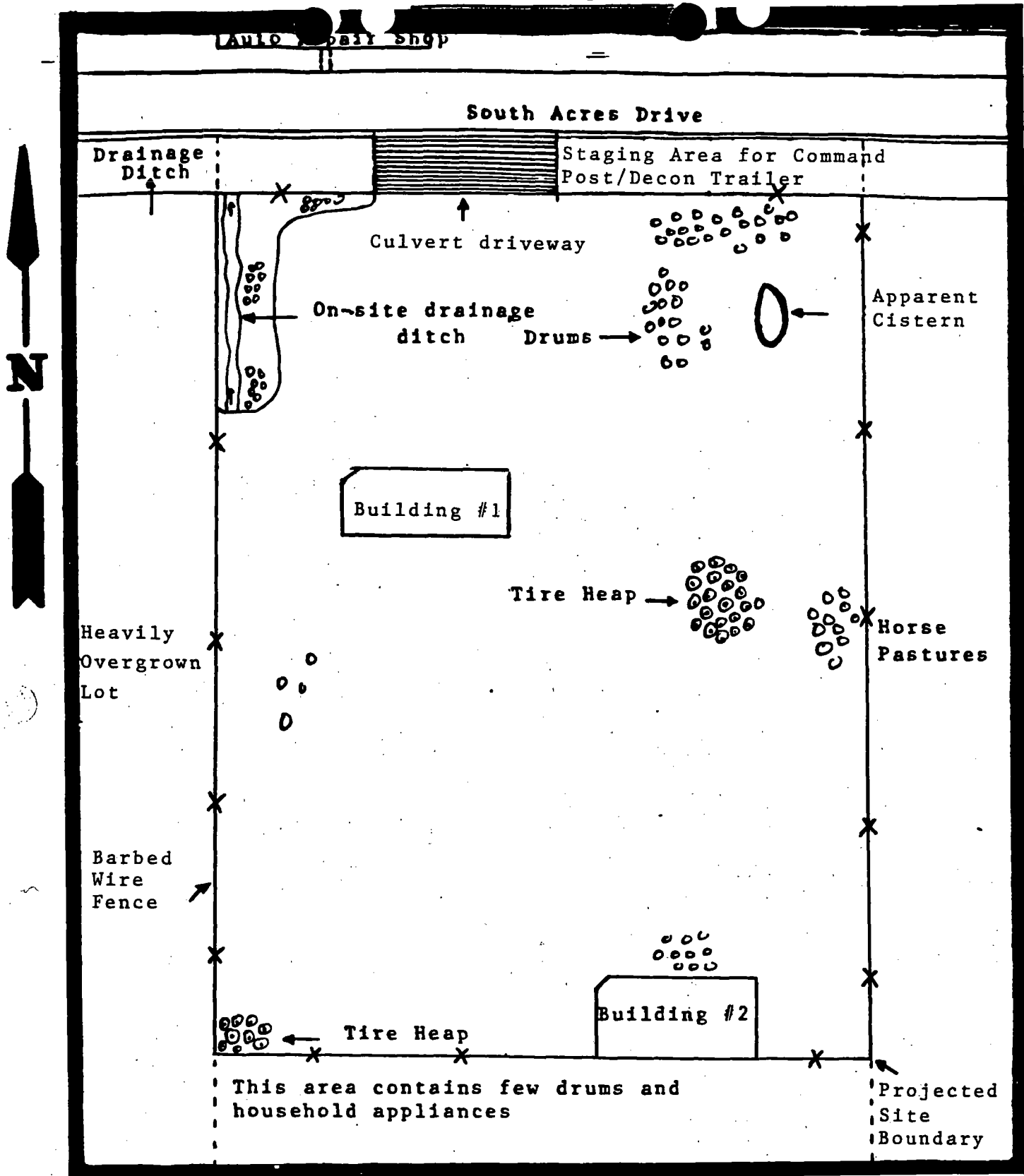
SCALE: 1:24,000

ORIGINATOR: Warren Zehner

DATE: 10/20/86 TDD: 06-8610-07

DCN. TAT-21-F-- 03603

WARREN ZEHNER



TITLE: Removal Action -

South Houston Drum Site

LOCATION: 6218 South Acres

Houston, Harris Cty., Tx.

MAP: Site Sketch

SCALE: None

ORIGINATOR: Warren Zehner

DATE: 10/20/86 TDD: 06-8610-07

DCN. TAT-21-F-- 03604

South Houston Drum

TXD981058949 301 Main  
TXD981058949 9360 Winkler  
TXD981058951 6218 S. Acres

DAL

EPA DAL

EPA DAL

EPA DAL

40 INFORMATION 4-0423205094-002 04/04/85  
105 IPMBNG2 CSP  
7137858152 DGM TLEN HOUSTON TX 184 04-04 0508P EST  
1WA 9106614125 EPA DAL  
1330 EPA

ATTN: DAVID LOPEZ

POLREP #1 SOUTH HOUSTON DRUM SITES, CITY OF SOUTH HOUSTON, POTENTIAL HAZARDOUS WASTE SITES

SITUATION: 1400 HOURS 29 MARCH 1985 5 DRUM STORAGE AND DISPOSAL SITE HAS BEEN FOUND IN AND NEAR THE CITY OF SOUTH HOUSTON, HARRIS COUNTY, TEXAS. THREE OF THESE SITES HAVE VARYING NUMBERS OF SURFACE DRUMS PRESENT 301 MAIN, 9306 WINKLER AND 6218 SOUTH ACRES. THE OTHER SITE 101 MAIN AND 1007 KENTUCKY WERE USED AS DISPOSAL PITS AND/OR DRUM BURIAL.

ACTION TAKEN: ON 28 AND 29 MARCH 1985 TATS SUPERVISED THE RESTAGING OF SEVERAL DRUMS ON THE 301 MAIN AND 9306 WINKLER SITE FOR THE PURPOSE OF SAMPLING THE CONTENTS OF THE DRUMS. TATS COLLECTED A TOTAL OF 12 SAMPLES: 5 FROM 301 MAIN, 2 FROM 9306 WINKLER AND 5 FROM 6218 SOUTH ACRES. SAMPLES WERE RELINQUISHED TO ARA LABORATORY ON 29 MARCH 1985. SAMPLES WILL UNDERGO PRELIMINARY SCREENING FOR CHEMICAL CONTAMINANTS. ONLY THOSE CONTAINING CONTAMINANTS WILL BE ANALYZED. SAMPLE RESULTS ARE SCHEDULED TO BE READY 10 DAYS AFTER ANALYSIS BEGINS.

PLAN: FUTURE PLANS ON THESE SITES ARE PENDING SAMPLE RESULTS.

CASE PENDING: EPA REGION 6 DALLAS

WARREN ZENNER

1711 EST

EPA DAL

## **REFERENCE 2**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VI  
1201 ELM STREET  
DALLAS, TEXAS 75270

ACTION MEMORANDUM

SUBJECT: Immediate Removal Recommendation for the 6218 ~~South Acres~~ St.  
Drum Site, Houston, Texas

FROM: David Lopez, On-Scene Coordinator  
Field Response Section (6ES-EF)

TO: Dick Whittington, P.E.  
Regional Administrator (6A)

THRU: Russell F. Rhoades, Director *RFR*  
Environmental Services Division (6ES)

PURPOSE:

This is to recommend an immediate removal action at the subject site to dispose of up to 300 drums containing hazardous wastes, and approximately 150 cubic yards of contaminated soil and debris.

BACKGROUND:

This site is located at 6218 South Acres Street in Houston, Harris County, Texas. This is a fringe metropolitan area, with the nearest residence approximately 150 feet away, and a small commercial establishment about 75 feet from the site. A middle school and a high school are within a half-mile of the site. The William P. Hobby Airport is about three miles east of the site. The site occupies approximately two acres, and about one third of it is obviously surface contaminated. There are approximately 300 drums on site, a number of which appear to be empty or have a small quantity contained in them. Soils in the vicinity of these drums are saturated with a dark oily liquid.

Site access is not restricted. It is bounded by South Acres Street on the north, a vacant lot to the west, and open fields to the east and south. South Acres Street is a major traffic artery for this part of the metropolitan area.

The site owner once provided or stored drums for a now defunct business known as Haul-A-Drum (HAD). HAD manufactured barbeque pits from 55-gallon drums. Two other sites involved with HAD are now the subjects of proposed immediate removal actions. Inventory of drum labels indicates that the drums were obtained from various Houston area industries. Labels indicate benzene, styrene, waste acids, distillation bottoms, naphthalene, and other organic materials.

The Environmental Protection Agency (EPA) became aware of the site through the City of South Houston. The City, in an investigation of HAD's business records found that the owner of this site had dealings with HAD. The EPA and the Houston TAT conducted preliminary site investigations on March 26, 1985, and found the site as described. Samples were collected by TAT on March 28, 1985 from unmarked drums. Results of the analyses are described below.

The site is not on the NPL, and is not expected to be listed.

#### THREAT:

The conditions at this site present a threat to the public health and the environment through the documented release and the potential release of hazardous substances contained in the drums. Additionally, there is the threat of fire and/or explosion. Samples of drums and soils show the presence of priority pollutants such as naphthalene, phthalate plasticizers, chlorinated phenols, as well as lead and chromium. Although not definitive, the analyses indicate the possible presence of dioxins.

There is high potential for offsite migration of the wastes. A large drainage ditch is situated on one extreme of the site near the drum storage area. This ditch drains to Sims Bayou, the major surface water drainage for the area. Additional threat may be posed by the unknown contents of the unsampled drums on site.

To date, no known action has been taken to abate the threat.

#### PROPOSED PROJECT AND ESTIMATED COSTS:

Immediate removal and disposal of the drums containing hazardous substances and the visibly contaminated soils is recommended. This will entail bulking the compatible liquids and recontainerizing noncompatible materials. Visibly contaminated soils are spotted over about one third of the site. Excavating to a "visibly clean" criterion is expected to require an average of one foot of soil removal and will therefore generate up to 150 cubic yards of contaminated soil for disposal.

Because of the large number of drums containing unknowns and the potential for the presence of dioxin, additional sampling and analyses will be required prior to disposal. Liquids must be tested for compatibility, and RCRA characteristics must be established. In the event that a disposal facility is not readily available, on-site storage of containerized wastes will be necessary. Site access will be restricted with appropriate warnings posted if this type storage is necessary.

It is estimated that seven to ten days will be required to conduct the proposed action.



Cost

The project ceiling cost is estimated as follows:

Clean-up Contractor	\$268,200
TAT	5,000
Intramural	<u>7,000</u>
Total	\$280,200

REGIONAL RECOMMENDATION:

An immediate removal action is recommended for the 6218 South Acres Street drum site in Houston, Texas because the conditions at the site meet the NCP Section 300.65 criteria. The estimated total project cost is \$280,200, of which \$268,200 is for extramural clean-up contractor cost. You may indicate your approval or disapproval by signing below.

APPROVED

Frederic E. Phillips

DATE

10.9.85

DISAPPROVED

DATE